

From: Molly M. Halloran
Sent: Wednesday, December 15, 2004 9:45 AM
To: NIEHS ICCVAM
Subject: please end cruel testing

Despite its mandate to promote the acceptance of alternatives to cruel and outdated animal tests, the U.S. Interagency Coordinating Committee on the Validation of Alternative Methods determined to do just the opposite. ICCVAM's proposed position on four well-established alternatives to the Draize rabbit eye-irritation test is the latest example of this.

Most European countries have accepted the results of these alternative tests since the 1990s for the purpose of identifying and classifying chemicals that cause severe eye irritation. However, ICCVAM has taken the position that, regardless of the result of a non-animal test, "confirmatory" testing should be carried out on animals. According to ICCVAM, even chemicals that exhibit corrosive or severely irritating properties *in vitro* should still be dripped or smeared into rabbits' eyes - just to be sure! This is ludicrous!

ICCVAM should follow the example set by European countries that accept the results of these *in vitro* methods, alone or in combination, to classify severely irritating and corrosive chemicals, and should eliminate proposals for "confirmatory" testing on animals. ICCVAM's background-review documents should clearly address the limitations of the current animal test for eye irritation, including its subjectivity, reproducibility, and its over- and under-prediction rate. ICCVAM should not presume to "validate" a non-animal method against an animal test that has never been properly validated itself.

I urge you to get up to date with your testing methods so that more animals don't have to suffer the fate of their countless predecessors. This is a new world, we don't have to resort to these cruel, antiquated methods anymore. Please consider following Europe's example.

~ Molly M. Halloran ~

"You must be the change you wish to see in the world." - Mahatma Ghandi

STOP ANIMAL CRUELTY NOW!